



Parcel E Feasibility Study



Responses to Comments on Draft Final Parcel E Feasibility Study

Hunters Point Naval Shipyard
March 29, 2012



Presentation Overview



- Review comments and preliminary responses for topics requiring further discussion
 - Alternatives for IR-03 (oil reclamation ponds)
 - Alternatives for IR-52 (railroad right-of-way)
 - Shoreline protection options
 - Integration with non-CERCLA restoration plans
 - Ecological assessments
- Next Steps



Alternatives for IR-03



Synopsized Comment (Water Board):

- Expressed preference for selection and implementation of the permanent remedy for IR-03 in a timely manner.

Preliminary Navy Response:

- Agreed. In conjunction with finalizing the FS Report, additional characterization and a bench-scale treatability study is being performed.
- The Final FS, Proposed Plan and ROD will discuss the ongoing work (future data will be included in the RD).



Alternatives for IR-03 (continued)



Synopsized Comment (CCSF DPH):

- Recommend evaluation of an additional alternative that bridges the gap between Alternatives N-5 and N-6 with respect to the depth of excavation.
- The NAPL source area exists primarily in the top 10 feet of the groundwater zone, suggesting that an excavation to this depth (approximately 19 feet bgs) would capture most or all of the NAPL source area.



Alternatives for IR-03 (continued)



Preliminary Navy Response:

- The characterization information presented in the Draft Final FS Report is identical to the information in the Revised RI Report and Draft FS Report.
- Therefore, the Navy believes that the request for a change to the Draft Final FS Report is not supported by new information.
- The Draft Final FS Report provides an appropriate range of remedial alternatives for IR-03, and the remaining uncertainty regarding the nature and extent of NAPL can be resolved prior to the RD.



Alternatives for IR-03 (continued)



Updated Characterization Data (discussed at January BCT meeting but not yet published):

- Within the former pond areas, the NAPL typically extends to the Bay Mud (generally consistent with assumptions in FS Report).

Boring Location	No. of Conf. Borings	Depth to Bay Mud (ft. bgs)	Depth of LIF NAPL Response (ft. bgs)	Depth of TPH >3,500 mg/kg
Pond Areas	6	18.5 - 29	8 – 22	11.5 – 23
NAPL Fringe	9	14 – 32	7 – 25	9 - 20
Outer Area	2	15 - 18	8 -12 (minor)	None



Alternatives for IR-03 (continued)



Synopsized Comment (CCSF DPH):

- Recommend a more detailed evaluation of the differences between thermal (low-heating), thermal with steaming (high-heating), and excavation, in terms of the expected residual concentrations.



Alternatives for IR-03 (continued)



Preliminary Navy Response:

- The ongoing treatability study will gather more information to support the requested evaluation, but it is not available at this time.
- In the absence of this information, the Navy believes that the current evaluation of thermally enhanced extraction of NAPL provides an adequate comparison to the proposed excavation and containment alternatives.
- The NAPL alternatives include a relatively conservative approach to thermally enhanced extraction of NAPL (involving ERH applied throughout the entire 2-acre IR-03 boundary).



Alternatives for IR-03 (continued)



Synopsized Comment (CCSF DPH):

- It is our strong preference that the Oil Ponds be remediated as much as possible.



Alternatives for IR-03 (continued)



Preliminary Navy Response:

- The performance objectives for the NAPL alternatives focus on preventing or minimizing migration of NAPL (or associated constituents in groundwater) to San Francisco Bay.
- No regulatory requirements would mandate physical removal of the NAPL if it is not considered practical.
- The Navy's evaluation of the existing remedial alternatives relative to the NCP criteria is adequate to identify the preferred alternative in the Proposed Plan.



Alternatives for IR-52



Synopsized Comment (Water Board):

- Section 4.2.2.1 states that covers will not be necessary at IR-52 because Tier 1 and Tier 2 excavations will bring the remaining incremental risks to within the acceptable risk management range. However, Alternative S-2 does not include soil excavations.
- Update the text to provide the appropriate justification for not including a cover at IR-52 under Alternative S-2.



Alternatives for IR-52 (continued)



Preliminary Navy Response:

- The RAOs in Section 3.1.1 will be revised to clarify that industrial remedial goals are the basis for demonstrating protectiveness of the soil remedies at IR-52.
- Section 4.2.2 will be revised to indicate that Alternative S-2 would include covers at 3 localized areas where concentrations exceed industrial remedial goals, and institutional controls (to restrict residential use at IR-52).



Shoreline Protection



Synopsized Comment (Water Board):

- The Water Board has an interest in maximizing the habitat functions of the shoreline area.
- Please add the following (or similar) language to the bulleted list of considerations in evaluating the potential effectiveness of each shoreline option:
"Maximize the habitat and wetland functions of the shoreline areas while complying with established RAOs."



Shoreline Protection (continued)



Preliminary Navy Response:

- "Ecological function of the shoreline" will be added as an evaluation factor.
- The most significant ecological function of the shoreline is seasonal use for wintering and migrating wildlife, but this function is moderated because of the toxicity of soil and sediment in the shoreline zone.
- The proposed shoreline options would protect wildlife from existing contamination, thereby improving the ecological function of the shoreline (as well as meeting RAOs and complying with ARARs).



Shoreline Protection (continued)



Synopsized Comment (Water Board):

- Clarify whether/how the conceptual design incorporates slopes and elevations that promote the establishment of appropriate native vegetation, which would maximize the ecological function of the area.
- If a sandy/rocky environment is better suited to increasing ecological value at this site, please provide a supporting discussion.



Shoreline Protection (continued)



Preliminary Navy Response:

- The current conceptual design could accommodate native vegetation to resist erosion, but vegetation is not required to protect humans and wildlife.
- Future refinements to the conceptual designs may incorporate different soil types and vegetation along the shoreline to enhance site aesthetics and improve ecological function.
- Refinements will be considered in the RD, but the current conceptual design will be retained in the FS Report because of the uncertain effectiveness of options relying on vegetative growth or alternative armor materials.



Shoreline Protection (continued)



Synopsized Comment (CCSF DPH):

- Could articulating concrete mats achieve the same objectives as underlying rock armor?



Articulated Concrete Mats





Shoreline Protection (continued)



Preliminary Navy Response:

- Articulated concrete mats will be evaluated in the RD.
- More information is needed to verify the ability of articulating concrete mats to serve as a robust containment structure that is effective in the long-term, and one that facilitates vegetative growth and enhances site aesthetics.
- In the absence of such information, the Navy believes that rock armor is an appropriate and adequately conservative option to compare against the NCP criteria.



Shoreline Protection (continued)



Synopsized Comment (Arc Ecology):

- The FS falls short in identifying viable variations of the preferred shoreline "hybrid" protection alternative that would maximize both protection and future shoreline values compatible with the Bay Plan (BCDC), redevelopment objectives, and ARARs.



Shoreline Protection (continued)



Preliminary Navy Response:

- As detailed in Appendices B and D, the proposed shoreline protection for Parcel E complies with the substantive provisions of the pertinent ARARs, including the federal Clean Water Act § 404 and the state McAteer-Petris Act and San Francisco Bay Plan.
- In addition, the proposed remedial alternatives presented in the Draft Final FS Report are compatible with the future reuses identified in the SFRA's amended HPS Redevelopment Plan.



Integration with Non-CERCLA Restoration Plans



Synopsized Comment (CCSF DPH):

- One of the "narrative performance standards" for soil covers is the prevention of standing water.
- The redevelopment of the site intends to include some small-scale variability in hydrology within the complex of swales, shallow depressions, and upland areas on Parcel E to use these areas as stormwater treatment wetlands.



Integration with Non-CERCLA Restoration Plans (continued)



Preliminary Navy Response:

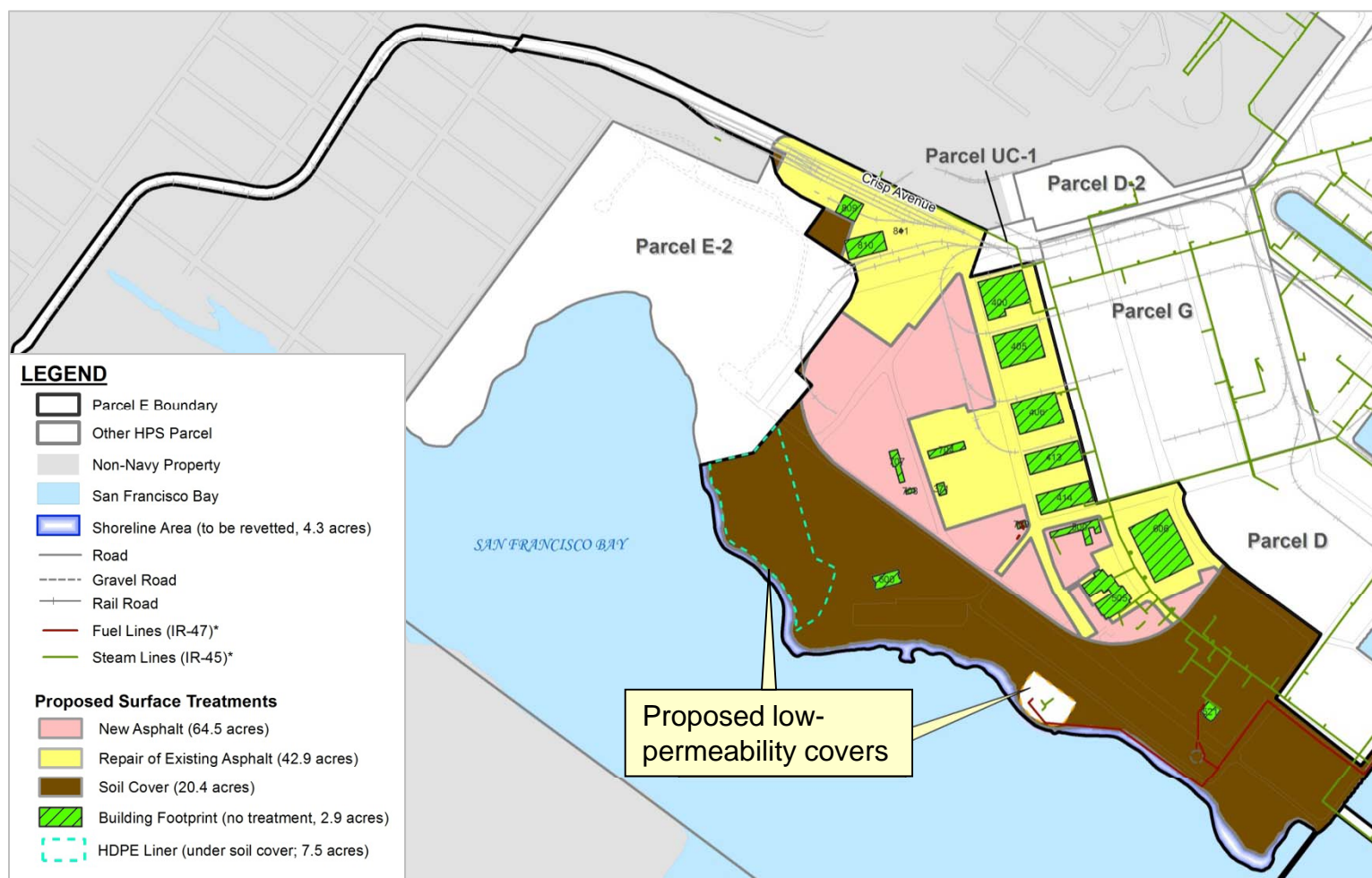
- The Final FS Report will be revised to clarify that the prohibition on standing water does not apply to the soil covers in Parcel E, but only the low permeability covers proposed in IR-02 Northwest and IR-03.



Integration with Non-CERCLA Restoration Plans (continued)



Figure 4-1 from Draft Final FS Report:





Integration with Non-CERCLA Restoration Plans (continued)



Synopsized Comment (Sierra Club and Audubon Society):

- We are concerned about the lack of discussion of native grasslands and a storm water drainage system because the cap will have to be designed to accommodate for these project characteristics.
- Failure to account for these design features during the alternative assessment, design and implementation phases will result in the incomplete or ineffective implementation of the native grassland, seasonal wetland, and bioswale features.



Integration with Non-CERCLA Restoration Plans (continued)



Preliminary Navy Response:

- The Navy will continue to work closely with SFRA and other stakeholders to align the remedial alternatives for Parcel E with SFRA's redevelopment project to the maximum extent practical.
- The Navy is not obligated to design or implement the habitat restoration concepts proposed by Arc Ecology to meet the ecological goals identified by the SFRA.
- The conceptual designs presented in the FS Report comply with the pertinent federal and state ARARs, and will accommodate CCSF's plans to construct stormwater management systems.



Ecological Assessments



Synopsized Comment (DFG-OSPR):

- Various special-status species have the potential to be present within or adjacent to the habitats at Parcel E (i.e., beach areas, intertidal wetland areas, upland areas).
- Therefore, please include a discussion in the text of these other special-status species that may be present at Parcel E.



Ecological Assessments (continued)



Preliminary Navy Response:

- Previous ecological assessments, that identified special-status species potentially present at Parcel E, were summarized in the Revised RI Report for Parcel E.
- The Revised RI Report was reviewed and approved by the EPA, DTSC, and Water Board in accordance with the FFA (in 2008).
- The previous findings are consistent with an independent study performed in support of the SFRA's 2009 EIR for the Phase II development of HPS.
- The Navy does not believe that sufficient technical basis exists to support DFG-OSPR's request to revise the subject text.



Ecological Assessments (continued)



Synopsized Comment (DFG-OSPR):

- In 2007, DFG-OSPR concurred with DTSC on the Draft Final RI that remedial actions based only on ecological hazard concern is not warranted for Parcel E.
- We also agreed with DTSC's comment that "future changes in use, such as the proposed establishment of a nearby wetland, would require re-evaluation of the terrestrial ecological hazard."
- The Navy's 2009 proposal to use Parcel E-2 for construction of tidal and freshwater seasonal wetland to mitigate losses elsewhere at HPS is a significant departure requiring the terrestrial ecological hazard to be re-evaluated.



Ecological Assessments (continued)



Preliminary Navy Response:

- Beginning in 2006, the Navy has been consistent in presenting its plans to restore wetlands at Parcel E-2, as documented in the draft and draft final versions of a WMMP (in 2006 and 2009), and the draft and draft final versions of the RI/FS Report for Parcel E-2 (in 2007 and 2009).
- The Navy does not agree that the current plans are significantly different than those presented prior to 2009.
- The Navy does not believe that sufficient technical basis exists to support DFG-OSPR's request for an updated ecological risk assessment at Parcel E.



Next Steps



- Electronic OTS review of draft RTCs:
April 11-20, 2012 (tentative)
- Working meeting to discuss key issues (if needed):
April 25, 2012 (tentative)
- Final FS Report:
July 2012 (tentative)